

September 27, 2024

Via ECF

Honorable Kimba M. Wood, USDJ
United States District Court
Southern District of New York
500 Pearl Street, Room 2540
New York, New York 10007

Re: *Patsy's Brand, Inc. v. I.O.B. Realty, Inc., et al.*
SDNY Case No.: 99-cv-10175-KMW

Dear Judge Wood,

Our firm represents non-party Respondent Brian Roffe, Esq. ("Attorney Roffe") with respect to Plaintiff Patsy's Brand, Inc.'s motion for contempt (Dkt. 397, *et seq.*) (the "Contempt Motion") and the associated proceedings in the above referenced matter. We write pursuant to Your Honor's direction and Individual Rule 1.A to advise the Court that while Attorney Roffe sincerely considered Your Honor's offer, he respectfully declines to submit to a remote deposition or questioning.

Undersigned counsel also respectfully reiterates our request for oral argument on the Contempt Motion, as stated during yesterday's hearing, following Adem Brija's response to Plaintiff's forthcoming subpoena.

We thank the Court for its attention and consideration as to this matter.

Respectfully Submitted,

FURMAN KORNFELD & BRENNAN LLP
COUNSEL FOR RESPONDENT BRIAN ROFFE, ESQ.



Spencer A. Richards
Benjamin M. Oxenburg

cc: Counsel of Record – via ECF